



South Carolina
DEPARTMENT OF CONSUMER AFFAIRS
293 Greystone Boulevard Suite 400
P. O. BOX 5757
COLUMBIA, SC 29250-5757

Carri Grube Lybarker
Administrator/
Consumer Advocate

**PROTECTING CONSUMERS
SINCE 1975**

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Columbia
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Summerville

April 4, 2022

VIA ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk/Executive Director
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

RE: Docket No. 2022-89-G
Application of Piedmont Natural Gas Company, Incorporated for Adjustment of Rates
and Charges

Dear Ms. Boyd:

Please find enclosed for filing the Petition to Intervene on behalf of the South Carolina Department of Consumer Affairs. As indicated on the Certificate of Service, all parties of record will be served via electronic mail.

Regards,

Roger Hall, Esq.
Deputy Consumer Advocate

Enclosures
Cc: Parties of Record (via email)

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2022-89-G

IN RE:)
)
 Application of Piedmont Natural Gas)
 Company, Incorporated for Adjustment)
 of Rates and Charges)
 _____)

PETITION TO INTERVENE

Carri Grube Lybarker, Administrator and Consumer Advocate for the South Carolina Department of Consumer Affairs (“Department”), respectfully petitions the South Carolina Public Service Commission (“Commission”) for permission to intervene in the above referenced Docket pursuant to R. 103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioner states as follows:

1. Piedmont Natural Gas Company, Incorporated. has filed an application with the Commission requesting approval for an adjustment of rates and charges and terms and conditions of gas service to its customers.

2. Pursuant to S.C. Code Ann. § 37-6-604 (2018), the Department may provide legal representation of the consumer interest before state and federal regulatory agencies when such agencies undertake to fix rates or prices for consumer products or services and may intervene as a party to advocate for the interest of consumers before the South Carolina Public Service Commission. In that capacity the Department does hereby petition to intervene as a formal party of record in Docket No. 2022-89-G

3. The Department works to avoid excessive, inadequate, and unwarranted rate increases; however, a position has not yet been fully developed on this matter. Petitioner reserves the right to set forth her position more fully as necessary and appropriate as this proceeding moves forward.

4. Counsel representing the Consumer Advocate/Department in this proceeding are:

Carri Grube Lybarker, Esquire
Roger P. Hall, Esquire
Connor J. Parker, Esquire
S.C. Department of Consumer Affairs
293 Greystone Blvd., Suite 400
P.O. Box 5757
Columbia, South Carolina 29250-5757
Phone: (803) 734-0045
Email: clybarker@scconsumer.gov
Email: rhall@scconsumer.gov
Email: cjparker@scconsumer.gov

5. The Consumer Advocate/Department consent to service via electronic mail and request all communications regarding this docket be directed to counsel of record noted above.

WHEREFORE, Petitioner, in order to represent the consumer interest of the State of South Carolina, requests the Commission grant this Petition to Intervene and make Petitioner a formal party of record, allowing Petitioner to actively participate in this proceeding.

Carri Grube Lybarker, Esquire
Administrator / Consumer Advocate

By: s/ Carri Grube Lybarker
S.C. Department of Consumer Affairs
293 Greystone Blvd., Suite 400
P.O. Box 5757
Columbia, South Carolina 29250-5757
Phone: (803) 734-0045

April 4, 2022
Columbia, South Carolina

**STATE OF SOUTH CAROLINA
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IN RE:)
)
Application of Piedmont Natural Gas)
Company, Incorporated for Adjustment)
of Rates and Charges)
_____)

CERTIFICATE OF SERVICE

I hereby certify I have caused to be served this day the Petition to Intervene to the individuals listed below via electronic mail as follows:

Bruce P. Barkley

Email: Bruce.Barkley@piedmontng.com

Christopher M. Huber

Email: chuber@ors.sc.gov

Nicole M. Hair

Email: nhair@ors.sc.gov

Pia Powers

Email: pia.powers@duke-energy.com

T. Richmond McPherson III

Email: rmcpherson@mcguirewoods.com

s/ Joan Williams

Joan Williams, Paralegal

April 4, 2022
Columbia, South Carolina